UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA APR 1 4 2000 NANCYMAYER-WHITTINGTON.CLERK U.S. DISTRICT COURT MDL No. 1285 MISC. No. 99-197 (TFH) THIS DOCUMENT RELATES TO ALL ACTIONS

STIPULATED ORDER

Plaintiffs and Roland Bronnimann, by their undersigned counsel, hereby agree to the following stipulated order:

- 1. The videotaped deposition of Roland Bronnimann shall be taken pursuant to Fed. R. Civ. P. 30 (a) (2) In the Allenwood Federal Prison Camp in Montgomery, Pennsylvania ("Allenwood") from 9:00 a.m. to 5:00 p.m. on any one of the following days prior to his release: April 17, 18, 19, 2000 solely regarding jurisdictional matters. The court reporting firm of Irvin Blanks, or any other firm approved by Allenwood, shall videotape and transcribe the deposition.
- 2. By entering into this stipulation and appearing for this deposition, Roland Bronnimann does not, and plaintiffs agree that he does not, waive and expressly preserves any and all objections and defenses, including but not limited to, the defense of lack of personal jurisdiction and any rights or obligations he may have as a Swiss citizen or under the Hague Convention.



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- 3. Roland Bronnimann's counsel shall be permitted to bring street clothing to Allenwood and Roland Bronnimann shall be permitted to wear that clothing during the course of the deposition.
- 4. This deposition shall be subject to the Protective Order endorsed by the Court on November 3, 1999, and any transcript, videotape or audio tape of that deposition shall be designated Confidential and Lawyers Only pursuant to that order. Further, only two sets of videotapes shall be made of the deposition. John Kinney, Esq. wlll hold one such set on behalf of the plaintiffs and William H. Devaney, Esq. will hold one such set on behalf of the defendants. With exception of submissions to the Court under seal, no videotape of the deposition will be further disclosed or distributed without the express written consent of Roland Bronnimann's counsel or by order of the Court.

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On behalf of plaintiffs

William H. Devanev Goldman & Hafetz 500 Fifth Avenue, 29th FI New York, NY 10110 (212) 997-7400

On behalf of Roland Bronnimann

SO ORDERED:

Thomas F. Hogan

United States District Judge

April 1 1/2000